

Conflicts of Interest Policy

Defined Terms

Capitalised terms used in this policy shall have the following meaning:

ARCC	Audit, Risk and Compliance Committee – a sub-committee of the Board of Directors of Oxford Policy Management Limited responsible for matters relating to audit, risk and compliance
COI - Conflict of Interest	A situation where an individual’s personal interests, family interests or loyalties conflict with those of OPM. COIs may be actual or potential.
Directors	Statutory directors of Oxford Policy Management Limited, the parent company and Oxford Policy Management Limited’s subsidiaries and branch and representative offices wherever located
OPM or us, we, our	Oxford Policy Management Limited, the parent company and Oxford Policy Management Limited’s subsidiaries and branch and representative offices wherever located and Oxford Policy Management Limited’s subsidiaries and branch and representative offices wherever located.
Representatives	All persons and entities working for or on behalf of OPM in any capacity, including agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives, Fellows of the Oxford Policy Fellowship, sponsors and business partners or any other person working with, or on behalf of OPM, wherever located
Staff	all persons working for OPM (which includes all OPM group entities) at all levels, including directors, officers, managers and employees, whether permanent, fixed-term or temporary

Introduction

- OPM** is committed to the highest standards of ethical conduct and integrity in our business activities. All **OPM’s Representatives** have an obligation to act in the best interests of **OPM**. This policy sets out **OPM’s** requirements in terms of **COIs**.
- A **COI** may arise where an individual’s personal interests, family interests or loyalties conflict with those of **OPM** and may include:

a. Financial	Where an individual may get direct financial benefit (either making a gain or avoiding a loss) from the consequences of a decision they are involved in making.
b. Non-financial professional interests	Where an individual may obtain a non-financial professional benefit from the consequences of a decision they are involved in making, e.g. increasing their professional reputation or promoting their career.
c. Non-financial personal interests	Where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit, because of decisions they are involved in making. For example, increasing personal reputation, gaining political influence or appointment to a Board of Trustees which may confer status.

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- d. Indirect interest** Where an individual has a close association with another individual (e.g. a friend, family member, or business partner) who has a financial or non-financial interest and who would benefit from a decision they are involved in making.
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Declaring a COI

3. If any **Representative** has an actual or potential **COI** they must declare it immediately using the form at Annex 1 (COI Declaration Form) to the OPM legal team (who can be contacted by email legal.contracts@opml.co.uk). If a **Representative** is in doubt whether a **COI** exists, they should seek advice from the OPM legal team.
4. Having an actual or potential **COI** is not in itself negative, but not declaring and managing any such **COI** is.
5. **Directors** of **OPM** also have legal obligations to declare **COI** in accordance with the relevant company constitution of which they are a **Director** and statutory requirements.
6. Situations which might lead to a **COI** and should therefore be declared include (please note this list is not exhaustive):

a. Financial investments	Representatives should disclose financial interests, including for example shares, bonds or options providing significant interests (25%+) in any entity that OPM does business with either as a client, supplier, or consortium partner.
b. Concurrent work	Representatives may be contracted by other entities for concurrent work whilst working on behalf of OPM (subject to their contract with OPM). Representatives should declare their concurrent paid or unpaid work that may conflict with OPM's business.
c. Public Appointments and Political Interests	Representatives should disclose public appointments and political interests, whether or not they are considered to conflict with OPM's business. OPM maintains a record of politically exposed persons who are Representatives .
d. Interests of family and close associates	Any interests of a Representative's family or close associates under points a-c in this table which might conflict with OPM's business should be disclosed.
e. Membership of Organisations and Societies	Representatives should disclose membership of organisations and societies that are relevant or might conflict with OPM's business or values
f. Receipt of gifts or hospitality	Gifts and hospitality have the potential to give rise to potential or actual COIs . All gifts and hospitality must be dealt with in accordance with OPM's Anti-Bribery and Corruption Policy and so be declared and recorded on OPM's Gifts and Hospitality Register.

7. In addition to declaring actual or potential **COIs**, **Representatives** must also inform the OPM legal team should a change occur in the status of the **COI**.
8. The OPM legal team review **COI** disclosures with a view to:
 - approving the **COIs** which do not have a material impact on **OPM's** business
 - agreeing suitable mitigation measures where a declared **COI** does or could have a material impact on **OPM's** business
9. The legal team maintains a centralized register of **COIs**, maintained and available here: [Company Policies - Conflict of Interest Register - All Items \(sharepoint.com\)](#)

Project-level COIs

11. **COIs** may be at company or project level, that is, they may conflict with the interests of **OPM's** business as a whole, or an individual project. Oversight and management of project-level **COIs** are the accountability of the relevant project manager, who must ensure that a COI register is maintained for each project they oversee.

Responsibilities

12. OPM Board – own this policy and are responsible for setting tone from top, fostering a culture of openness and probity. The **ARCC** has delegated oversight authority to ensure the effectiveness of this policy.
13. Head of Legal – has primary oversight of this policy, monitoring its use and effectiveness. Head of Legal also authorises entries to the COI register and proposed mitigations to actual or potential **COIs**, or may nominate a senior manager to do so.
14. Governance Risk and Compliance Officer – maintains the COI Register, provides day-to-day advice on compliance to **OPM Representatives**, and is responsible for awareness-raising activities.
15. OPM Recruitment Team – responsible for distributing this policy to our preferred employment candidates prior to contracting, and for forwarding any **COIs** declared through the COI Declaration Form to the OPM legal team.
16. Project Services Staff – responsible for distributing this policy to any project suppliers prior to contracting, and for forwarding any corporate-level COIs declared through the COI Declaration Form. Project Services Staff are also responsible for maintaining a project-level COI Register for all projects they support on behalf of their Project Manager.
17. All **Representatives** are responsible for informing the Head of Legal of any company-level **COIs** through submission of a completed COI Declaration form. All **Representatives** are further responsible for informing the Head of Legal should the status, scope or nature of their **COI** alter.

Breaches of this policy

18. Failure by a Representative to disclose an actual or potential COI may be treated as a disciplinary event and could result in the termination of employment of employees or termination of the engagement of other Representatives.

Awareness raising

19. All new **Representatives** will be made aware of this COI policy and asked to declare any actual or potential **COI** prior to contracting. The OPM legal team will publicise this policy annually to all staff.

END

ANNEX 1 – OPML INTERESTS DECLARATION FORM

Surname:		Title:	
First Name(s):			
Home Address:			
Role whilst working for OPML			
Description of the Conflict of Interest (i)			
Relevant Dates From: To:			
Comments (ii)			

The information submitted will be held by OPM legal team to comply with its policies. This information may be held in both manual and electronic form in accordance with the Data Protection Act 2018. Information may be disclosed to OPM’s clients and professional advisers.

I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations must be notified to the OPM legal team (legal.contracts@opml.co.uk) as soon as practicable and no later than 28 days after the interest arises or the change occurs.

Signature:

Date:

ⁱ Provide a description of the interest that is being declared. This should contain enough information to enable a reasonable person with no prior knowledge to be able to understand the nature of the interest.

ⁱⁱ Note any action taken to manage the (potential) conflict of interest, and/or detail any relevant approvals or permissions.

Conflicts of Interest Policy

Document Purpose:

To identify and minimise the potential impact of conflicts of interest, and to ensure that they are appropriately considered and documented in our work.

Policy Owner	Head of Legal		
Applies to	All employees, Directors and anyone working for or on behalf of OPM		
Global or local scope	Global		
Version Number	3.0	Effective from	08/06/2022
Approvals (Dates)	OPML Board		08/06/2022
	Management Team		18/05/2022
	Other (please state)		N/A